

**IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JAYWANA PALMER, as Administrator)	
of the Estate of ROMELLO PALMER,)	
deceased,)	
)	Case No. 2018 C 6054
Plaintiff,)	
v.)	Judge: Robert W. Gettleman
)	
THE CITY OF CHICAGO,)	Magistrate: Jeffrey Cummings
Kenneth Moranz, Star #5687, Nicholas Nunez,)	
Star #13672, Emil Hageline, Star #3213,)	
Mitchell English, Star #7647, Nicholas Mukite,)	
Star 15038, and Brian Collins, Star #16773,)	
)	
Defendants.)	

**THE PARTIES' JOINT MOTION TO STAY DISCOVERY AND RESPONSIVE
PLEADINGS**

All parties, by and through their respective counsel, respectfully request that this Court stay discovery responsive pleadings until the conclusion of the upcoming settlement conference.

In support of this Motion, the parties state as follows:

1. The parties appeared before Magistrate Judge Cummings for a status conference on August 13, 2019. During that conference, the parties represented that Plaintiff had sent a written settlement demand to Defendants, that Defendants had made a counter offer, and that, in response, Plaintiff had issued a new settlement demand. Undersigned counsel informed the Court that the parties would confer regarding settlement after the status hearing to determine whether a settlement conference would be beneficial.

2. Magistrate Judge Cummings ordered that the parties contact the Court's deputy by August 16, 2019, as to whether a settlement conference should be scheduled. (ECF #83).

3. The parties conferred after the August 13, 2019, status hearing and agreed that a

settlement conference would be beneficial and therefore should be scheduled. The parties thereafter contacted Magistrate Cummings' deputy to inform her of the above.

4. Magistrate Cummings then issued an order setting the settlement conference for November 20, 2019. (ECF #84)

5. As part of ongoing discovery, there are numerous depositions scheduled to take place prior to the settlement conference on November 20, 2019. All parties request a stay of discovery until the conclusion of the settlement conference because these depositions would incur significant additional attorney fees that would make any possible settlement between the parties more difficult.

6. Additionally, Plaintiffs filed an amended complaint on July 25, 2019 (ECF #82). Defendants intend to move to dismiss a number of counts within the Amended Complaint which will require briefing by the parties and will incur additional attorney fees which, as stated above, will make any possible settlement more difficult.

7. For these reasons, the parties request that this Court stay discovery and responsive pleadings until the conclusion of the settlement conference on November 20, 2019.

WHEREFORE, the parties request that this Court stay discovery and any responsive pleadings until the conclusion of the settlement conference and for any other any relief the Court deems appropriate and just.

Respectfully submitted,

/s/Mark C. Haines

Mark C. Haines

Assistant Corporation Counsel

JENNIFER BAGBY, Chief Corporation Counsel
GREGORY BECK, Assistant Corporation Counsel
MARIA MAGGINAS, Assistant Corporation Counsel
Counsel for the Individual Defendant Officers
City of Chicago, Department of Law
Federal Civil Rights Litigation Division
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
Phone: (312) 744-3982
Fax: (312) 744-6566
Atty. No. 6287914

MARK FLESSNER
Corporation Counsel of the City of Chicago

BY: /s/Marion C. Moore
Marion C. Moore
Assistant Corporation Counsel Supervisor

MARION MOORE, Supervising Assistant Corporation Counsel
JULIE MURPHY, Supervising Assistant Corporation Counsel
ANDREA CAMPBELL, Assistant Corporation Counsel
CHERYL FRIEDMAN, Assistant Corporation Counsel
Counsel for Defendant City of Chicago
City of Chicago, Department of Law
Federal Civil Rights Litigation Division
30 North LaSalle Street, Suite 900
Chicago, Illinois 60602
Phone: (312) 744-5170
Fax: (312) 744-6566
Atty. No. 6302566

/s/ Jeanette Samuels
Jeanette Samuels

Jeanette Samuels
Counsel for Plaintiff
Samuels & Associates, Ltd.
2925 S. Wabash Avenue
Suite 104
Chicago, IL 60616

CERTIFICATE OF SERVICE

I, Mark Haines, hereby certify that I served a copy of the foregoing upon on all counsel of record on August 16, 2019 by filing a copy using with the District Court's Electronic Filing System.

/s/Mark C. Haines